

MEMO ENDORSED



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December 20, 2024

VIA ECF

Honorable Andrew L. Carter, Jr
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Sheng Shengxia v. City of New York, et al.,
24 Civ. 5082 (ALC)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and the attorney representing defendant the City of New York in the above-referenced matter.¹ The undersigned respectfully writes to request a thirty (30) day extension of time to respond to the Court's Valentin Order, from December 23, 2024 until January 22, 2025. This is the first request for an extension of time to respond to the Court's Valentin Order. Ms. Krishnamurthy attempted to contact plaintiff *pro se* Sheng Shengxia for his consent prior to the submission of this letter via the e-mail address plaintiff provided on the docket, however, Ms. Krishnamurthy was unable to make contact with plaintiff.

By way of background, Plaintiff, who is proceeding *pro se*, brings this action, pursuant to 42 U.S.C. § 1983, alleging, *inter alia*, that members of the New York City Department

¹ This case has been assigned to Assistant Corporation Counsel Shreya Krishnamurthy, who is awaiting admission to the New York State Bar. Ms. Krishnamurthy is handling this matter under my supervision and may be reached at (212) 356-2671 or shrekris@law.nyc.gov.

of Homeless Services (“DHS”) violated his constitutional rights in conducting unlawful searches of his unit at 52 Williams Street on January 4, 2024 and “for over ten days” thereafter. ECF No. 1. Plaintiff named DHS as the defendant in this action. Id. On October 23, 2024, the Court dismissed DHS as a defendant and directed the Clerk of Court to add the City of New York (“City”) and DHS Employees John and Jane Doe 1-4 as defendants. See ECF No. 8. Additionally, the Court directed the City of New York to “ascertain the identity of each John or Jane Doe whom Plaintiff seeks to sue here and the address where the defendants may be served” by December 23, 2024. Id.

This Office conducted an investigation into the allegations of the Complaint. Upon information and belief, and based on that investigation, no search was conducted in the Plaintiff’s shelter unit at the Highland Park Manhattan Sanctuary located at 52 Williams Street, New York NY 10005 on January 4, 2024. However, records indicate that in January 2024, there was a search of Plaintiff’s unit within the shelter conducted on January 12, 2024, and that there were several other searches conducted thereafter on January 16, 2024, January 20, 2024, January 26, 2024, and January 27, 2024. Further, based on this Office’s initial investigation, upon information and belief, the individuals who were involved in the searches of Plaintiff’s unit are not employees of DHS. Upon information and belief, Plaintiff’s shelter unit is a part of the Highland Park Manhattan Sanctuary facility and this facility’s service provider is Highland Park Development Corporation.

The reason for the instant thirty (30) day extension of time request is this Office requires additional time to attempt to ascertain the identities of the members of the Highland Park Manhattan Sanctuary facility who were involved in the searches of Plaintiff’s unit on January 12, 2024, January 16, 2024, January 20, 2024, January 26, 2024, and January 27, 2024.

Accordingly, the undersigned respectfully requests that the Court grant a thirty (30) day extension of time for this Office to respond to the Court’s Valentin Order, from December 23, 2024 until January 22, 2025.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Inna Shapovalova

Inna Shapovalova

Senior Counsel

Special Federal Litigation Division

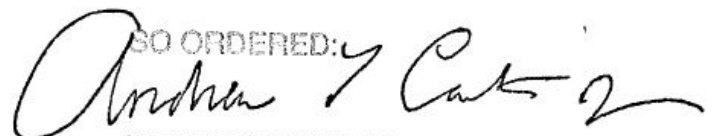
cc: VIA FIRST CLASS MAIL

Sheng Shenxia

Plaintiff pro se

127 Allen St., Apt 6C

New York, NY 10002



HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

December 23, 2024

New York, NY